

**MEMO ENDORSED**

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February 22, 2021

**VIA ECF**

Hon. Judge William H. Pauley III  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Room 1920  
New York, New York 10007

Re: ***Larry W. Jander and Richard J. Waksman v. Retirement Plans Committee of IBM, Richard Carroll, Martin Schroeter, and Robert Weber***  
**Civil Action No. 15-cv-3781 (WHP)**

Dear Judge Pauley,

On behalf of plaintiffs Richard Waksman and Larry Jander and defendants Retirement Plans Committee of IBM, Martin Schroeter, Richard Carroll and Robert Weber, we write to advise the Court that, after engaging in mediation discussions with Robert Meyer of JAMS, the parties have agreed in principle on a settlement of the above-titled matter.

To finalize the details of the settlement, as well as to prepare the initial papers seeking the Court's preliminary approval, the parties respectfully request a stay of all deadlines in the case. The parties will confer and submit to the Court by March 8, 2021 a proposed schedule for preliminary approval, notice to class members, and final approval of the matter. We are available to further discuss the matter if the Court wishes to do so.

**ZAMANSKY**  
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Respectfully submitted,

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/s/ Samuel E. Bonderoff

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Attorneys for Defendants

Application granted. All pending deadlines in this case are stayed. The parties shall confer and submit to this Court a proposed schedule for preliminary approval, notice to class members, and final approval of the matter by March 8, 2021.

SO ORDERED:

  
WILLIAM H. PAULEY III  
U.S.D.J.

Dated: February 25, 2021  
New York, New York